



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 20 1998

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**CERTIFIED MAIL**

Amvac Chemical Corporation  
Attn: W.F. Millar  
2110 Davie Avenue  
Commerce, CA 90040-1076

RECEIVED  
JUL 29 1998  
OPP PUBLIC DOCKET

Dear Mr. Millar:


The purpose of this letter is to initiate implementation of the risk mitigation proposals for ethion set forth in a letter from FMC Corporation to the Agency dated 7-26-95. These proposals are being used for the risk assessments currently being conducted in support of reregistration and implementation of the Food Quality Protection Act of 1996 (FQPA). This being the case, the Agency believes it is important that all ethion labels be amended to reflect the specific proposals listed below:

- \* Reduction of the maximum rate of application from 2.5 - 3.0 lbs/ai/A to 2.5 lbs./ai/A.
- \* Reduction of the maximum number of applications from three per year to two per year.
- \* Prohibition of aerial applications.
- \* Restrictions on airblast applications (airblast outside three rows from outside the grove with nozzles of sprayer on grove side only; nozzles facing away from the grove must be turned off; shut off spray when turning at end of rows and when passing gaps in tree rows; direct spray away from bodies of water).

Label amendments must be submitted as formal amendments on EPA Form 8570-1 along with five copies of the revised label. This package should be addressed to Tina Levine, Chief, Insecticide-Rodenticide Branch, Registration Division (7504C), Office of Pesticide Programs, U.S. Environmental Protection Agency, 401 M Street SW, Washington, D.C. 20460. A courtesy copy should also be sent to Mark Hartman, Reregistration Branch II, Special Review and Reregistration Division (7508W) at the above address.

We request that all label amendments be submitted to the Agency by April 30, 1998.  
All companies with ethion registrations will be asked to submit amendments per this schedule.  
If you have any further questions or comments please contact Mark Hartman at  
(703) 308-0734.

Sincerely,

A handwritten signature in black ink, appearing to read "Lois A. Rossi", followed by the date "1/5/".

Lois A. Rossi  
Director  
Special Review and Reregistration  
Division

A handwritten number "2" enclosed within a circle, located in the bottom right corner of the page.